

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF PENNSYLVANIA: HARRISBURG**

THE UNITED STATES OF  
AMERICA *ex rel.* JESSE M.  
POLANSKY, M.D., M.P.H.,

*Plaintiff,*

v.

GESINGER HOLY SPIRIT;  
GEISINGER COMMUNITY  
MEDICAL CENTER; GEISINGER  
MEDICAL CENTER; SPIRIT  
PHYSICIAN SERVICES INC.

*Defendants.*

Civil Action No.

1:20-CV-00599

(Judge Conner)

**STIPULATION AND PROPOSED ORDER REGARDING  
DEFENDANTS GEISINGER COMMUNITY MEDICAL CENTER'S AND  
GEISINGER MEDICAL CENTER'S  
DEADLINE TO RESPOND TO COMPLAINT**

Pursuant to Rule 6(b) of the Federal Rules of Civil Procedure, Defendants **Geisinger Community Medical Center** and **Geisinger Medical Center** respectfully submit this stipulation regarding their time to answer, move with respect to, or otherwise respond to Plaintiff's Complaint, subject to the Court's approval of this stipulation.

1. Defendant Geisinger Medical Center was served with the Complaint on January 18, 2024 and the original deadline for filing a responsive pleading as to this Defendant is February 8, 2024. ECF No. 40.

2. Defendant Geisinger Community Medical Center was served with the Complaint on January 22, 2024 and the original deadline for filing a responsive pleading as to this Defendant is February 12, 2024. ECF No. 39.

3. Having recently been served with the 100-page Complaint, these defendants requested from Plaintiff's counsel an extension of sixty (60) days to review and evaluate the allegations in the Complaint in order to adequately prepare a response. Plaintiff's counsel has agreed to the requested extension.

4. This is the first extension requested by the Geisinger in this matter and the parties agree that this extension will not cause undue delay or prejudice to any party.

WHEREFORE, Plaintiff, Geisinger Community Medical Center, and Geisinger Medical Center hereby stipulate as follows:

Geisinger Community Medical Center's and Geisinger Medical Center's time to respond to Plaintiff's Complaint is extended to April 8, 2024.

**IT IS SO STIPULATED.**

<p><u>/s/ Jeffry W. Golan</u>  Jeffrey W. Golan (PA 33729)  David E. Bacine (PA 16742)  BARRACK, RODOS &amp; BACINE  3300 Two Commerce Square  2001 Market St. Philadelphia, PA 19103  Tel: (215) 963-0600  jgolan@barrack.com  dbacine@barrack.com</p> <p>Stephen Shackelford, Jr. (NY 5393657)*  Mark Musico (NY 5238001)*  Nicholas C. Carullo (NY 5598578)*  SUSMAN GODFREY L.L.P.  1301 Ave. of the Americas, 32nd Fl.  New York, NY 10019  Tel.: 212-336-8330  Fax: 212-336-8340  sshackelford@susmangodfrey.com  mmusico@susmangodfrey.com  ncarullo@susmangodfrey.com  Attorneys for Plaintiff-Relator</p> <p>Dated: February 7, 2024</p>	<p><u>/s/Lesli C. Esposito</u>  Lesli C. Esposito (PA 201916)  McDERMOTT WILL &amp; EMERY LLP  500 North Capitol Street, NW  Washington, District of Columbia 20001  Tel:(202)-756-8445  lesposito@mwe.com</p> <p><i>Attorney for Geisinger Community  Medical Center and Gesinger Medical  Center</i></p> <p>Dated: February 7, 2024</p>
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SO ORDERED:

Dated: February \_\_, 2024

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Hon. Christopher C. Conner  
Chief Judge  
Middle District of Pennsylvania (Harrisburg)

## **CERTIFICATE OF SERVICE**

I hereby certify that on February 7, 2024, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing by ECF on all counsel of Record

By: /s/ Lesli C. Esposito